

IN THE UNITED STATES DISTRICT  
COURT SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JACQUELINE SMITH, )  
Independent Administrator )  
of the Estate of )  
Danarian Hawkins, Deceased )  
PLAINTIFF, ) CAUSE OF ACTION NO.  
4:15-cv-2226  
v. )  
HARRIS COUNTY )  
DEFENDANT, )

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ORAL AND VIDEOTAPED DEPOSITION OF

**SERGEANT STEVEN WILSON**

May 24, 2017  
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ORAL AND VIDEOTAPED DEPOSITION OF SERGEANT STEVEN  
WILSON, produced as a witness at the instance of the  
Plaintiff, and duly sworn, was taken in the above-styled  
and numbered cause on the 24th of May, 2017, from  
10:09 a.m. to 3:33 p.m., before Keith McCabe, CSR in and  
for the State of Texas, reported by machine shorthand, at  
the Harris County Attorney's Office, 1019 Congress Street,  
Meeting Room 111, Houston, Texas, 77002, pursuant to the  
Federal Rules of Civil Procedure and the provisions stated  
on the record or attached hereto.

1           A.    I've had tons of training. So I'm sorry. I  
2    can't --

3           Q.    I understand. You are required to do some  
4    ongoing training for your peace officer certification; is  
5    that right?

6           A.    Yes.

7           Q.    And so that training is through TCOLE, correct?

8           A.    It reports to TCOLE.

9           Q.    So it would be on your TCOLE training record,  
10   correct?

11          A.    Yes, ma'am.

12          Q.    Okay. Did you receive training on suicide  
13   detection and prevention in jails?

14          A.    Yes.

15          Q.    Do you remember when that was?

16          A.    No, ma'am.

17          Q.    Was it once?

18          A.    I don't recall.

19          Q.    Could it have been more than once?

20          A.    Possibly.

21          Q.    Do you recall when was the last time you might  
22   have received that training?

23          A.    No, ma'am.

24          Q.    Okay. Do you recall if that was an in-person  
25   training?

1 A. I don't recall.

2 Q. Okay. Do you remember if as part of that  
3 training you learned about different mental illnesses that  
4 inmates can have?

5 A. I guess I'm not following you. I don't recall  
6 exactly how the training went; so --

7 Q. Do you recall anything about the content of that  
8 training?

9 A. Suicide prevention.

10 Q. Let me ask you some details, and if you don't  
11 remember them, you can just tell me you don't remember  
12 them. Do you remember learning about bipolar disorder?

13 A. Yes.

14 Q. Do you remember learning about symptoms of  
15 bipolar disorder?

16 A. Yes.

17 Q. Do you remember learning about psychosis?

18 A. Yes.

19 Q. Do you remember learning about symptoms of  
20 psychosis?

21 A. Yes.

22 Q. Do you remember learning about major depression?

23 A. Yes.

24 Q. Symptoms of major depression?

25 A. Yes.

1 Q. Schizophrenia?

2 A. Yes.

3 Q. Symptoms of schizophrenia?

4 A. Yes.

5 Q. So it's fair to say you learned about a number of  
6 mental illnesses that inmates could have?

7 A. For anybody, yes.

8 Q. And there were some components of that training  
9 that was about the role of correctional officers in  
10 preventing suicide in jails, correct?

11 A. I don't recall.

12 Q. Okay. Do you recall anything about how to handle  
13 an inmate who is found hanging?

14 A. No.

15 Q. How about how to respond to an inmate who has  
16 tried to kill himself by overdosing?

17 A. I guess I'm -- even the question before I'm  
18 having trouble with. You're asking for a very -- a  
19 specific response to a generalized situation. So there  
20 are options available, but there is no one right way to  
21 respond to that.

22 Q. In general, that you were trained on responding  
23 to suicides if you encounter them --

24 A. Yes.

25 Q. -- right?



1                   Okay. And in general, you were trained on  
2 methods of suicide prevention in jail, correct?

3           A.    Yes.

4           Q.    Okay. And the goal of that training also  
5 included detecting suicide risk in particular inmates,  
6 correct?

7                   MS. HEDGE: Objection; calls for speculation.

8           A.    I'm not following you.

9           Q.    (BY MS. NATARAJAN) So you learned also about how  
10 to detect suicide risk in inmates; correct?

11                   MS. HEDGE: Objection; calls for speculation  
12 and vague.

13           A.    Again, that's a vague question. I don't know how  
14 to answer that.

15           Q.    (BY MS. NATARAJAN) So you don't recall, for  
16 example, learning that correctional officers can help  
17 figure out if someone is at higher risk of suicide than  
18 other inmates?

19                   MS. HEDGE: Objection; calls for speculation,  
20 calls for information that would be expert opinion or  
21 knowledge. This witness has not been established to be an  
22 expert in that area.

23           A.    I don't know how to answer that.

24           Q.    (BY MS. NATARAJAN) So you don't recall being  
25 trained about that?

1 MS. HEDGE: Object -- same objections.

2 A. I'm not following you; so I don't know how to  
3 answer that.

4 Q. (BY MS. NATARAJAN) Okay. You do remember being  
5 trained about methods of suicide prevention. You said  
6 that, correct?

7 A. Yes.

8 Q. And part of preventing suicide includes figuring  
9 out who is suicidal in the jail, correct?

10 MS. HEDGE: Objection; calls for speculation,  
11 assumes facts not in evidence, and no proper foundation or  
12 predicate has been laid.

13 A. I can't answer that question.

14 Q. (BY MS. NATARAJAN) You were trained on  
15 responding to suicides properly, correct?

16 A. Yes.

17 Q. And that training included the importance of CPR  
18 and first aid, correct?

19 A. Yes.

20 Q. When you were a sergeant at the jail, did you  
21 receive any instruction with regard to suicide prevention?

22 MS. HEDGE: Objection; vague.

23 A. Instruction as -- I'm not following you again.

24 Q. (BY MS. NATARAJAN) You received instruction  
25 sometimes from your supervisors, correct?

1 Q. Okay. So according to this report, it sounds  
2 like you heard a floor page requesting rovers for a  
3 medical emergency in 2J2, correct?

4 A. Yes.

5 Q. Do you have an independent memory of that?

6 A. The actual page itself?

7 Q. Yeah.

8 A. No.

9 Q. Okay. Do you have an independent memory of  
10 arriving on the scene, however?

11 A. Yes.

12 Q. And what did you do when you arrived on the  
13 scene?

14 A. I responded to the location where I was being  
15 directed to.

16 Q. Okay. And it sound like -- sounds like you got  
17 there and you found an inmate by the name of Carl Simmons  
18 who was outside his cell who said that he was helping out,  
19 correct?

20 A. Yes.

21 Q. And so it looks like you ordered inmate Simmons  
22 to go back to his cell, and he immediately complied,  
23 correct?

24 A. Yes.

25 Q. Do you have an independent memory of this inmate



1 named Simmons helping out with this incident?

2 A. No.

3 Q. You didn't witness him helping out in any way,  
4 right?

5 A. No.

6 Q. By the time you got there, he was just standing  
7 there?

8 A. Yes.

9 Q. And you ordered him to get back into his cell,  
10 and you locked the cell door?

11 A. Yes.

12 Q. Okay.

13 A. Well, he locked his own cell door. He closed it.

14 Q. Okay. Okay. It says next that you saw inside  
15 the cell, and by this I think you meant Mr. Hawkins's  
16 cell, Officer Cano beginning chest compressions on inmate  
17 Danarian Hawkins.

18 A. Yes.

19 Q. Do you see where it says that?

20 Do you remember where Mr. Hawkins was placed  
21 at the time?

22 A. He was on the bunk bed -- or the bed.

23 Q. Okay. And it says Officer Cano was beginning  
24 chest compressions, and you saw a white sheet tied around  
25 Hawkins's neck; is that right?



1 A. Yes.

2 Q. And he was unresponsive, and there was foam  
3 around his mouth, correct?

4 A. Yes.

5 Q. And it looks like you tried to loosen the sheet  
6 around his neck; is that correct?

7 A. No.

8 Q. Okay. I'm going to read to you where it says, "I  
9 was able to loosen the sheet around inmate Hawkins's neck,  
10 but the knots could not be broken."

11 A. Yes.

12 Q. So do you have any independent recollection of  
13 that apart from what's in this report?

14 A. Yes.

15 Q. Okay. What do you remember about that?

16 A. I remember loosening the knot. It was already  
17 loose, but I wanted to try to get it looser and if not  
18 remove it to secure the knot. So I did my best to -- to  
19 do it, but I wasn't able to completely untie the knot.

20 Q. Can you just explain to me what it means when you  
21 say, "I was able to loosen the sheets but not the  
22 knots" -- or "not break the knots." What does that mean?

23 A. Well, the knots were tied too tight where I  
24 couldn't get them undone without focusing completely on  
25 the knots. Priority number one at that point in time is

1 CPR and revival of the inmate.

2 Q. And so how are you able to loosen the sheet if  
3 you couldn't get the knots undone?

4 A. As I -- as I pulled it together, I was able to  
5 loosen up and get a hand underneath it where it was no  
6 longer restrictive. And then at that point in time, I  
7 didn't worry about it anymore.

8 Q. Okay. So when you got there, the knot was still  
9 so tight that it was restrictive?

10 A. No. It was still loose. I tried to loosen it  
11 more.

12 Q. I see. Okay.

13 And you were able to get a couple of your  
14 fingers underneath that knot after you loosened it?

15 A. Yes.

16 Q. Okay. And that whole time Officer Cano was  
17 concentrating on chest compressions?

18 A. Correct.

19 Q. Can you just show me, using your hands, what it  
20 looks like when you're performing chest compressions?

21 A. You want to see what --

22 Q. Just pretend, you know, that there's a body in  
23 front of you. Is it -- do you have your hands here? Do  
24 you need one hand and one hand does something -- what --  
25 what are you supposed to do?

1 Q. Okay. So he went to go get that. How does it  
2 help CPR?

3 A. I'm not a person on that. It is a box where  
4 you -- you follow the instructions, and it tells you  
5 exactly what to do step by step.

6 Q. In order to do CPR?

7 A. Or to administer shock or perform CPR.

8 Q. Okay. And then it says DO Thompson was ordered  
9 to retrieve the cut-down tool from the pod control center  
10 in order to remove the and secure the knot in the sheet.

11 Do you see where it says that?

12 A. Yes.

13 Q. And it says the other detentions officers were  
14 staged for relief in chest compressions.

15 A. Yes.

16 Q. What does that mean, "staged for relief in chest  
17 compressions"?

18 A. That means as soon as one gets tired, the next  
19 one can fall in without any lapse in time.

20 Q. Perfect. Okay.

21 And where it says Officer Thompson was  
22 ordered to retrieve the cut-down tool -- now the cut-down  
23 tool is something like a knife with a hook on it; is that  
24 right?

25 A. It's been a while since I've seen it, but, yes.



1 Q. Okay. And a cut-down tool is kept in jails so  
2 that if someone is hanging, then you can quickly cut them  
3 down; is that right?

4 A. It's -- it's staged in certain spots in the jail,  
5 yes.

6 Q. Okay. And the staging is for -- basically for  
7 rescue, right? That's what the cut-down tool is for?

8 A. General purpose, yes.

9 Q. Okay. And where was the cut-down tool kept? It  
10 says -- the reason I ask is it says, "He was ordered to  
11 retrieve the cut-down tool from the pod control center."  
12 Is that where it was kept?

13 A. Yes, ma'am.

14 Q. Okay. And where was it kept in the pod control  
15 center?

16 A. In that particular pod, I don't recall.

17 Q. Is there other pods, is there a place where it's  
18 usually kept?

19 A. Yeah. There's usually a designated spot. It's a  
20 red box, but each pod had a little different spot  
21 depending on the layout. So I don't recall the exact  
22 location in that pod.

23 Q. Is the box on the wall like a fire extinguisher  
24 box?

25 A. A fire extinguisher box?



1 Q. You know the red boxes that have a fire  
2 extinguisher, and then you crash it and you get the fire  
3 extinguisher out or the fire --

4 A. I haven't seen one of those in years.

5 Q. I'm old. But when you say a red box, was it  
6 inside of sort of a tool-chest sized box?

7 A. Again -- again, it's been a while since I've  
8 actually looked at it. It -- it was -- it was big enough  
9 to house the device.

10 Q. Okay. And always kept in the pod control center?

11 A. In a locked secure area, yes.

12 Q. Okay. Now it says, "After numerous chest  
13 compressions, I ordered Cano to stop CPR to check for a  
14 pulse. After checking, I was unable to find a pulse, and  
15 there was no sign of breathing."

16 So it looked like you tried to find his  
17 pulse?

18 A. Yes.

19 Q. And you weren't able to find a pulse?

20 A. That is correct.

21 Q. And there was no sign of breathing?

22 A. That is correct.

23 Q. And at this time, Cano was continuing chest  
24 compressions?

25 A. No.

1 Q. I'm reading from the -- from the report. It says  
2 right after it says, "There was no sign of breathing. DO  
3 Cano was ordered to continue chest compressions."

4 A. Okay. Yes.

5 Q. Okay. And then Lawson arrived with the AED to --  
6 and then tried to activate the device?

7 A. Yes.

8 Q. And it looks like the next thing that happened is  
9 that medical personnel arrived on-scene. Do you remember  
10 that?

11 A. Yes.

12 Q. Do you remember that independently of this  
13 report?

14 A. Yes.

15 Q. So are we talking about medical personnel from  
16 the jail?

17 A. Yes.

18 Q. And do you remember who exactly the personnel  
19 was?

20 A. Who exactly, no, ma'am.

21 Q. Was it nurses from the jail?

22 A. Yes.

23 Q. And were there two of them?

24 A. I believe so, but I don't remember an exact  
25 count.

1 Q. Did they arrive with any equipment?

2 A. They had a stretcher. I don't recall anything  
3 else.

4 Q. Okay. And it says that medical personnel arrived  
5 on-scene and took over before the AED could be  
6 administered.

7 Do you see that?

8 A. Yes.

9 Q. Do you remember that independently?

10 A. Yes.

11 Q. And do you remember what the medical personnel  
12 did at that time?

13 A. They ordered us -- they ordered us to take inmate  
14 Hawkins out of the cell, carry him downstairs with the  
15 gurney so they can get him down to the clinic as soon as  
16 possible.

17 Q. And then did you see them take him down to the  
18 clinic?

19 A. No.

20 Q. Okay. According to your report, Cano, Lawson,  
21 and you carried inmate Hawkins down the stairs and placed  
22 him on the gurney.

23 A. Yes.

24 Q. Do you remember from your own memory of doing  
25 that?



1 A. Yes.

2 Q. And how did you guys carry him?

3 A. I believe we had one on each arm, and one of us  
4 had the legs. I don't recall who had what position.

5 Q. Okay. And then you put him on the gurney -- the  
6 three of you put him on the gurney?

7 A. Yes.

8 Q. And then as soon as you put him on the gurney,  
9 did the medical personnel take him down to the clinic?

10 A. Yes.

11 Q. All right. And it says, "After that, I remained  
12 briefly in the cell block and ensured that the screen was  
13 secured."

14 Do you see that?

15 A. Yes.

16 Q. And then after that you proceeded to the clinic;  
17 is that right?

18 A. Correct.

19 Q. So when you got to the clinic, do you have any  
20 independent memory of getting to the clinic and watching  
21 what happened at the clinic?

22 A. They -- when I got there, they were -- the entire  
23 clinic staff doctors were all working on inmate Hawkins.

24 Q. And -- they were trying to see if they could  
25 revive him, right?



1 THE WITNESS: All right. It's mine. Okay.

2 EXAMINATION

3 BY MS. HEDGE:

4 Q. You were asked some questions earlier about  
5 cut-down tool. Do you recall that?

6 A. Yes.

7 Q. And you had ordered detention officer to go  
8 retrieve the cut-down tool after Mr. Hawkins had already  
9 been removed from hanging in his cell; is that correct?

10 A. Yes.

11 Q. Did Mr. -- did Detention Officer Thompson, in  
12 fact, return with the cut-down tool?

13 A. Yes.

14 Q. What was the time period in which he returned  
15 with the cut-down tool?

16 A. It was after inmate Hawkins had been taken -- put  
17 on the stretcher and taken by medical. They performed the  
18 CPR to take him down to the clinic for additional  
19 treatment.

20 Q. Did you order detention officer to then go down  
21 to the medical clinic?

22 A. No.

23 Q. You testified earlier that you then secured the  
24 scene before you went down to the medical clinic; is that  
25 correct?

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JACQUELINE SMITH, )  
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REPORTER'S CERTIFICATION  
DEPOSITION OF SERGEANT STEVEN WILSON  
May 24, 2017

I, Keith McCabe, Certified Shorthand Reporter in  
and for the State of Texas, hereby certify to the  
following:

That the witness, SERGEANT STEVEN WILSON, was  
duly sworn by the officer and that the transcript of the  
oral deposition is a true record of the testimony given by  
the witness;

I further certify that pursuant to FRCP Rule  
30(f)(1) that the signature of the deponent:

\_\_\_\_\_ was requested by the deponent or a party

1 before the completion of the deposition and returned  
2 within 30 days from date of receipt of the transcript. If  
3 returned, the attached Changes and Signature Page contains  
4 any changes and the reasons therefor;

5   X   was not requested by the deponent or a  
6 party before the completion of the deposition.

7 I further certify that I am neither attorney nor  
8 counsel for, related to, nor employed by any of the  
9 parties to the action in which this testimony was taken.

10 Further, I am not a relative or employee of any  
11 attorney of record in this cause, nor do I have a  
12 financial interest in the action.

13 Subscribed and sworn to on this the 1st day  
14 of June, 2017.

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Keith McCabe, CSR No. 8873  
Expiration Date: 12/31/2017  
DepoTexas - Firm Registration No. 95  
13101 Northwest Freeway, Suite 210  
Houston, Texas 77040  
Phone: 281.469.5580